

November 14, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184

Dear Ms. Dortch:

On November 12, 2013, Dan Leeds and Terri Shuck (the National Public Education Support Fund), Bob Wise (Alliance for Excellent Education), Richard McKeon (The Leona M. and Harry B. Helmsley Charitable Trust) and Reg Leichty (Partner, EducationCounsel) met with Commissioner Rosenwercel and Christianna Barnhart of her staff.

Our presentation focused on the comments filed by the National Public Education Support Fund and partner foundations on September 16, 2013. These comments are attached hereto. Specifically, we urged the commissioner to use the E-rate proceeding to promote digital equity for all students, establish minimum target connectivity speeds, raise the program cap to support new capital and ongoing investments, and simplify the program. The group also noted that a significant government investment in this important infrastructure will trigger and enable greater private investment in the educational tools and practices that require broadband capacity and highlighted education reforms that would benefit from better connectivity levels.

Please direct any further questions about the meeting to the undersigned.

Sincerely,

/s/ Reg Leichty

Reginal Leichty
Partner
EducationCounsel

cc: Commissioner Rosenwercel, Christianna Barnhart

**Before the Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Modernizing the E-rate Program for)	WC Docket No. 13-184
Schools and Libraries)	

Joint Comments of The GE Foundation, National Public Education Support Fund, Nellie Mae Education Foundation, Robert R. McCormick Foundation, The Sandler Foundation, and William and Flora Hewlett Foundation

We are writing to respond to the Wireline Competition Bureau’s notice of proposed rulemaking regarding modernization of the “E-rate” program. As leading national and regional foundations focused on systematically improving U.S. public education systems across the continuum from birth through career, we collectively and individually have significant experience in encouraging innovations in the nation’s public schools. Our diverse initiatives include efforts focused on promoting the development and implementation of practices and strategies for strengthening – and in some cases fundamentally transforming – public education. The success and scalability of our school, district, and state level initiatives, however, increasingly depends on the presence of cutting edge technologies and high capacity broadband services. As a result, we applaud the Federal Communications Commission (FCC) for taking this very timely and important step toward the development of a more robust broadband infrastructure in every one of the nation’s classrooms.

Our foundations share a deep commitment to promoting educational equity, including promoting digital equity in and through the nation’s public schools. Our vision of equity includes a core belief that all students must graduate high school ready for college, career and citizenship. This ambitious goal includes ensuring that every student acquires the knowledge, skills, and dispositions essential for later success. We know from experience that achieving this level of preparation for postsecondary success cannot be accomplished well, or at scale, without providing teachers and students access to the cutting edge technologies and broadband services that have fundamentally transformed nearly every other aspect of modern society. Failing to use this opportunity to promote digital equity will hinder otherwise effective efforts to solve the persistent problems facing public education and the broader economy.

Many emerging education policy and practice reforms, such as the delivery and use of next generation online assessments, using robust data to personalize instruction, transitioning to project based learning, and delivering access to rich interactive digital content, require access to innovative technologies and tools. The technologies needed to support implementation of these and other important reforms, in turn depend on the presence of high capacity broadband, which is woefully absent in most American classrooms. This rulemaking represents a once in generation opportunity to address this troubling broadband gap in a way that aligns with and supports ongoing federal,

state, and local education reform efforts. Establishing ubiquitous high capacity broadband in the nation's public school classrooms will have the additional benefit of promoting new and expanded public-private partnerships. Greater access to high capacity broadband will enable our foundations and other private funders of public education to invest new resources for supporting implementation of a range of technology-driven new reforms.

During the past 15 years, the E-rate facilitated a seven fold increase in the number of classrooms connected to the Internet. Despite the program's success in promoting basic Internet access, however, the high capacity broadband divide remains stark in the nation's public schools, leaving many teachers and students without access to resources and tools common in most other sectors of the economy. With this national problem in mind, we respectfully urge the FCC to consider the following recommendations for building on the success of the E-rate:

- 1. The Updated Program Should Maintain a Strong Commitment to Equity Access to Funding.** Our organizations strongly support the E-rate's traditional recognition of the importance of ensuring equitable access to program funds. We respectfully urge the FCC to ensure that any modifications to the program's distribution formulas continue to carefully account for the poverty levels of the student populations served by applicants. The new E-rate should aim to strengthen opportunities to learn and reduce existing gaps in opportunity and achievement.
- 2. The Annual E-rate Cap Should be Permanently Raised to Ensure the Timely and Sustainable Delivery of High-Capacity Broadband Connectivity To and Within Schools.** E-Rate funding has remained largely flat since the program's creation in 1996. On a national scale, schools' unmet broadband needs are too large to be addressed without additional investment. As noted by the FCC, 80% of K-12 schools do not have sufficient broadband and 83% have outdated Wi-Fi networks. Furthermore, every year applicants' requests for E-rate support substantially exceed available funding. For this funding year (and consistently over prior funding years), schools and libraries sought approximately \$4.9 billion, which is more than twice the program's current annual cap of \$2.38 billion. Given this incredible ongoing demand, we respectfully urge the FCC to significantly raise the cap in the near term to support timely investment in the broadband infrastructure needed now by our public schools, and later continue the cap above current funding levels to support ongoing improvement of their broadband networks over time and to stay abreast of technological developments. Although the NPRM's proposed efforts to reduce costs, refocus funds, and identify targeted priorities is needed and could serve to significantly strengthen the E-rate program, such steps alone are very unlikely to generate sufficient savings to support the level of investment needed to ensure that all classrooms have access to high-capacity broadband. The level of investment needed to connect all classrooms to high capacity broadband will only be met if the FCC raises the cap, and as described above, this important government investment will trigger and enable greater private investment in tools and practices that require broadband capacity in order to succeed and achieve their full potential.

- 3. Minimum Connectivity Speeds Should be Identified to Define and Measure Progress Toward “Broadband that Supports Digital Learning.”** The FCC should establish a floor – not a ceiling – describing the broadband capacity needed to support digital learning, including the delivery of next generation assessments, robust data driven personalized instruction, and the use of rich interactive digital content. Establishing a clear connectivity goal (not a mandate) – with the knowledge that the measures must evolve over time to recognize evolving technology needs – will help to ensure the program progresses toward its core objective and provide a sound basis for policy makers to take any needed additional steps to ensure timely build-out of high capacity broadband to every classroom. We agree with, and urge the FCC to adopt, the broadband capacity targets identified by the State Educational Technology Directors Association (SETDA) and recognized by the Leading Education By Advancing Digital Commission (LEAD Commission). The recommendations call for 100 Mbps of bandwidth for every 1,000 students/staff members by 2014-15, growing to 1 Gbps by 2017-18.
- 4. The E-rate Application Process should be Stream-lined to Reduce Administrative Burdens on Schools and other Applicants.** We agree with the FCC that the E-rate’s application process should be simplified to minimize the administrative burden on applicants. The current application process places an undue burden on schools, often requiring the use of outside experts and countless hours of staff time that could be dedicated to other educational purposes. Such administrative changes should include utilizing a strengthened online application process, eliminating unnecessary forms and questions and providing additional technical support to help applicants navigate the process.

In conclusion, we want to reiterate our strong support for the FCC’s efforts to modernize the E-rate to meet the needs of 21st Century educators and their students. Properly updated and supported, we believe a strong E-rate program will contribute significantly to the vitality of the nation’s schools and continued global economic leadership. Thank you for carefully considering our recommendations.

Sincerely,

The GE Foundation

www.gefoundation.com

Nellie Mae Education Foundation

www.nmefoundation.org

William and Flora Hewlett Foundation

www.hewlett.org

National Public Education Support Fund

www.npesf.org

Robert R. McCormick Foundation

mccormickfoundation.org

The Sandler Foundation

www.sandlerfoundation.org